

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

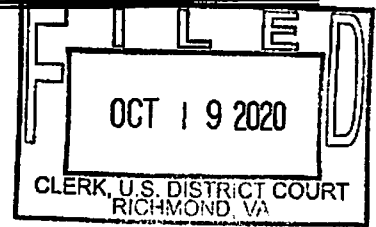
UNITED STATES DISTRICT COURT

for the

Eastern District of Virginia



Richmond Division



Marla Faith Crawford

Case No.

3:20cv813

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Melvin Hughes, Honorable
in
John Marshall Courts Building
Richmond, Virginia

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Jury Trial: (check one)



Yes



No

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS
(Non-Prisoner Complaint)

DISTRICT COURT
RICHMOND, VIRGINIA

2020 OCT 19 P 2:54

RECEIVED

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Marla Faith Crawford		
Address	6523 South Stevens Hollow Drive		
	Chesterfield	Va	23832
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Chesterfield		
Telephone Number	804-397-4480		
E-Mail Address	eliteeducationalconsulting9@gmail.com		

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name	Melvin Hughes, Honorable		
Job or Title (if known)	Judge		
Address	400 N 9th Street		
	Richmond	Va	23219
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Richmond City		
Telephone Number	804-646-6505		
E-Mail Address (if known)			

☐ Individual capacity ☒ Official capacity

Defendant No. 2

Name			
Job or Title (if known)			
Address			
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County			
Telephone Number			
E-Mail Address (if known)			

☐ Individual capacity ☐ Official capacity

Defendant No. 3

Name _____

Job or Title (if known) _____

Address _____

City

State

Zip Code

County _____

Telephone Number _____

E-Mail Address (if known) _____

☐

Individual capacity

☐

Official capacity

Defendant No. 4

Name _____

Job or Title (if known) _____

Address _____

City

State

Zip Code

County _____

Telephone Number _____

E-Mail Address (if known) _____

☐

Individual capacity

☐

Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

☐Federal officials (a *Bivens* claim)☒

State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials? 14th Amendment (Equal Protection)

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

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- D. Section 1983 allows defendants to be found liable only when they have acted “under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia.” 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.
- Each time the Plaintiff (African American Female) was before the Circuit Court, the Defendant violated her rights by ruling in opposition of Va Codes and Rules of the Supreme Court of Virginia to deny her rights to housing and rights to money the Plaintiff earned to ensure the opposing party (White Man and or Woman) prevailed or bring harm to the Plaintiff.
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III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?
Richmond, Virginia
-

- B. What date and approximate time did the events giving rise to your claim(s) occur?
2007 (Evicted Plaintiff from Home She Own)
2011 (Continued Behavior)
2019 (Refuse to address Motion; Rule in Opposition of VA Code 8.01-28)
2020 (Violate Rule 1:1 of Virginia Supreme Court So Defense Can Sue Plaintiff)
-

- C. What are the facts underlying your claim(s)? *(For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)*
- Issue#1: In 2007, Melvin Hughes gave my home to a white male and Plaintiff was arrested for living in her home. Plaintiff went back to to Court around 2011 and was denied. Plaintiff was homeless from 2007 -2008 and lived with a family member. She rented a home from 2008-2012 when she purchased another home in 2012. The opposing party left Virginia for North Carolina.
- Issue#2: In 2019 subsequent matter unrelated to the first matter, Defendant changed the hearing date for money she work for to status hearing and subsequently ruled in opposition of Va. 8.01-28 denying Plaintiff money that defense counsel (White Female) indicated her client was responsible for because defense didn't want to pay the amount of debt owed (gave defense immunity from the debt). The Court Jurisdiction expired 1/7/2020 in matters and the Court entered a 1/10/2020 nonfinal Order drafted by the opposing party in opposition of Rule 1:1 of the Virginia Supreme Court so they could sue Marla Crawford , bringing additional harm to Marla Crawford.
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IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Issue #1: Melvin Hughes evicted Plaintiff from her home. Marla Crawford was homeless from 2007 to 2008. Marla Crawford lost all her furniture, clothings, business equipment, her children's clothing and personal items and a 4 bdrm-2bth-2 story cape cod home that she currently has the title to. Marla Crawford had to rent a home in the amount of \$995 for her and her son to live in from 2008-2012. Marla Crawford had to encure a mortgage debt of \$124,000 in 2012. The Defendant made it possible for multiple bargain deeds of sale to be filed on the property located at 1913 Clearfield Street of Richmond, Virginia. [NOTE: Marla Crawford was advised that if she return to the property located at 1913 Clearfild Street, she will go to jail for criminal trasspassing.]

Issue#2: Marla Crawford is occurring additional legal expenses and became subjected to a civil sue because Melvin Hughes opporated outside of his jurisdiction.

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

All Bargain Deeds of Sale on the property located at 1913 Clearfield Street of Richmond, Va. to be void. Marla Crawford's title to the home be upheld because she never sold the property. And if not, Marla Crawford is requesting \$236,000 (value of the property as of 10/18/2020).

Reimbursment of Rent Paid from 2008-2012 in the amount of \$41,790 (42 months of Rent Paid at \$995 per month).

Additional legal expenses form 12/17/2019 to present TBD

Court Filing Fees and Services Fees Related to this claim before the District Court

\$1.5million in puitive Damages for being homeless, loss of possessions, being arrested for living in my home, being placed under a bond and sitting in the Richmond City lockup.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 10/18/2020

Signature of Plaintiff

Printed Name of Plaintiff


Dr. Marla Faith Crawford

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address